UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN - NORTHERN DIVISION

| In the Matter of: | |
|---------------------|------------------------------|
| | CHAPTER 13 PROCEEDING |
| BLANCA S. RODRIGUEZ | CASE NUMBER: 19-20324 |
| | HONORABLE DANIEL S. OPPERMAN |
| Debtor(s) | |
| | 1 |

AMENDED OBJECTION TO CONFIRMATION OF FIRST MODIFIED POST-CONFIRMATION CHAPTER 13 PLAN

NOW COMES Thomas W. McDonald, Jr., Chapter 13 Trustee, and hereby objects to the Debtor(s) Chapter 13 Plan as follows:

1. The debtors have failed to file an Amended Schedule I and/or J to substantiate the change in plan payments as required by E.D. Mich. LBR 3015-2(3).

WHEREFORE, the Chapter 13 Trustee prays this Court deny confirmation of the proposed Chapter 13 Plan.

Dated: October 24, 2022

/s/Thomas W. McDonald, Jr.
Thomas W. McDonald, Jr.(P32464)
Chapter 13 Trustee
3144 Davenport Avenue
Saginaw, Michigan 48602
Telephone: (989) 792-6766
ecf@mcdonald13.org

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CERTIFICATE OF SERVICE OBJECTION TO CONFIRMATION OF FIRST MODIFIED POST-CONFIRMATION CHAPTER 13 PLAN

I, the undersigned, do hereby certify that on October 24, 2022, I have electronically filed the foregoing papers with the Clerk of the Court using the ECF system which will send notification to any party registered with the ECF System, and hereby certify that I have mailed by the United States Postal Service the Papers to the following non-ECF participants:

Blanca Rodriguez 1118 Cass Street Saginaw, Michigan 48602

/s/Jennifer Drzewicki

Jennifer Drzewicki Office of Thomas W. McDonald, Jr. Chapter 13 Trustee 3144 Davenport Avenue Saginaw, Michigan 48602 Telephone: (989) 792-6766 ecf@mcdonald13.org